

ESTTA Tracking number: **ESTTA421620**

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91200251
Party	Defendant Crayton, Zaneta S
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Submission	Answer
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Date	07/25/2011
Attachments	Microsoft Word - Answer.pdf (1 page)(33875 bytes)

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Answer

IBOM is a motivational, self empowerment company, based in Culver City CA. The sole function of the business is to deliver motivation to the public through quotes, affirmations, positive thinking articles and fashion (clothing, shoes and jewelry). IBOM is a social movement not just a fashion brand. Therefore, IBOM (referred to as "Applicant" herein) does not pose any danger to ECCO sko A/S (referred to as "Opposer" herein) mark based on the following reasons:

1. IBOM is an acronym that stands for "I Bet On Me" and has/will be sold in commerce as such.
2. Based on the meaning behind the Applicants brand and how it is being sold in commerce as a motivational movement there will not be any confusion from the consumers between the mark IBOM and BIOM.
3. Based on how the applicants brand is being sold in commerce there will not be likelihood that goods will be seen as being sponsored by the Opposer.
4. Since IBOM is a motivational acronym that stands for I Bet On Me and BIOM does not appear to have a similar motivational meaning tied to it there will not be any danger or confusion.

Applicant is requesting that Opposers opposition be denied and the hearing proceedings are moved to the next stage.

Respectfully,

Zareta Crayton

IBOM
Owner